STATE IDENTIFICATION NUMBER (If Applicable)



TLO 025022997 EPA IDENTIFICATION NUMB

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS TREATMENT, STORAGE, AND DISPOSAL FACILITIES Form A - General Facility Standards

I. General Information:

| (A) | Facility Name: Acme Barrel Company |
|------|--|
| (B) | Street: 2300 W. 13th Street |
| -(C) | City: Chicago (D) State: IL (E) Zip Code: 60608 |
| (F) | Phone: 312/829-3838 (G) County: Cook |
| (H) | Operator: Acme Barrel Company . |
| (I) | Street: 2300 W. 13 ! Street |
| (J) | City: Chicago (K) State: IL (L) Zip Code 60608 |
| (M) | Phone: 312/829-3838 (N) County: Cook |
| (0) | Owner: American Nat. Bank + Trust - Trust No. 38159 |
| (P) | Street: 33 N. La Salle Street |
| (Q) | City: Chicago (R) State: IL (S) Zip Code: 60602 |
| (T) | Phone: 312/661-5000 (U) County: Cook |
| (V) | Date of Inspection: Oct. 20, 1982 (W) Time of Inspection (From) 11:30om (To) 1:15 pm |
| (X) | Weather Conditions: Cloudy 38°F |
| | |

| (Y) | Person(s) Interviewed | Title | Telephone |
|------|--|--------------------------|---------------------------------------|
| | Ronald C. Meyer | Comptroller | 312/829-3838 |
| (Z) | Inspection Participants | Agency/Title | Telephone |
| | Clifford Gould | IEPA EPS | 312/345-9780 x290 |
| (AA) | Duananan Information | | |
| (AA) | Preparer Information Name Cl:fford Gould | Agency/Title TEPA/EPS | Telephone <u>312/345-9780×29</u> c |

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

Incineration and/or Thermal Treatment NAD. X A. Storage and/or Treatment 1. Containers (I)
2. Tanks (J) N/A
3. Surface Impoundments (K) N/A
4. Waste Piles (L) N/A (0 and P)

Chemical, Physical, and Biological N/AE. Treatment (Q)

N/AB. Land Treatment (M)

MAC. Landfills (N)

If facility is also a generator or transporter of hazardous waste complete sections Note: IX and X of this form as appropriate.

III. GENERAL FACILITY STANDARDS: (Part 265 Subpart B)

| | | | Yes | No | NI* | Remark |
|-----|-----|--|-------------|-------------|---------------|-------------------------|
| (A) | | the Regional Administrator notified regarding: | | | | |
| | 1. | Receipt of hazardous waste from a foreign source? | | | | N/A receive haz waste |
| | 2. | Facility expansion? | | | . | N/A planned |
| (B) | Gen | eral Waste Analysis: | | | | |
| | 1. | Has the owner or operator obtained a detailed chemical and physical analysis of the waste? | <u>X</u> | | | |
| , | 2. | Does the owner or operator have a detailed waste analysis plan on file at the facility? | <u>X</u> | | | |
| | 3. | Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site? | | | | N/A accept waste from |
| (C) | Sec | curity - Do security measures include (if applicable) | : | | | off-2ife. |
| | 1. | 24-Hour surveillance? | <u>x</u> | | | Security guand + alarm |
| | 2. | Artificial or natural barrier around facility? | <u>×</u> | | | Forme + building walls. |
| | 3. | Controlled entry? | × | | | Gates & building doors |
| | 4. | Danger sign(s) at entrance? | <u>×</u> | | | are locked. |
| (D) | | Owner or Operator Inspections | | | | |
| | 1. | Records of malfunctions? | X | | | |
| | 2. | Records of operator error? | | | | AIN |
| | 3. | Records of discharges? | <u>x</u> _ | | · —— | |

III. GENERAL FACILITY STANDARDS - Continued

| | | | Yes | No | NI* | Remarks |
|-----|-----|---|------------|----------|-----|---|
| | 4. | Inspection schedule? | ۲. | *** | *** | ********** |
| | 5. | Safety, emergency equipment? | X | | *** | Done by contractor on Monthly basis |
| | 6. | Security devices? | X | | ••• | Done by contractor for alarm system |
| | 7. | Operating and structural devices? | X . | *** | *** | ********* |
| | 8. | Inspection log? | X | ••• | | *************************************** |
| (E) | | personnel training records lude: (Effective 5/19/81) | | | | |
| | 1. | Job titles? | *** | X. | *** | ***** |
| | 2. | Job descriptions? | | X. | | *********** |
| | 3. | Description of training? | | X | *** | ********** |
| | 4. | Records of training? | *** | × | *** | ******************** |
| | 5. | Have facility personnel received required training by 5-19-81? | | × | *** | ************************* |
| | 6. | Do new personnel receive required training within six months? | *** | <u>×</u> | *** | |
| (F) | req | required are the following special uirements for ignitable, reactive, or ompatible wastes addressed? N/A | | | | |
| | 1. | Special handling? | | *** | | ***************** |
| | 2. | No smoking signs? | | | *** | ************************ |
| | 3. | Separation and protection from ignition sources? | | *** | *** | ******************************* |

^{*}Not Inspected

IV. PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

| (A) | Maintenance and Operation of Facility: | Yes | No | NI* | Remarks |
|-----|---|--------------|-------------|-------------|-----------------|
| | Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent? | | <u>×</u> | | |
| (B) | If required, does the facility have the following equipment: | | | | |
| | 1. Internal communications or alarm systems? | | | ****** | Page system |
| | 2. Telephone or 2-way radios at the scene of operations? | <u>*</u> | | | Handi-talki |
| | 3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? | <u>*</u> | | | shovel & lime. |
| | Indicate the volume of water and/o | or foam avai | lable | for fi | re control: |
| | Plant is sprinkpland - wat | or from | Chica | go fin | e hydrants |
| | • | | | | |
| | | | | | |
| (C) | Testing and Maintenance of Emergency Equipment: | | | | |
| | 1. Has the owner or operator established testing and maintenance procedures for emergency equipment? | <u>*</u> | | | Done by outside |
| | 2. Is emergency equipment maintained in operable conditions? | _ < | | | Contractors. |
| (D) | Has owner or operator provided immediate access to internal alarms? (if needed) | * | | | Alarm connected |

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*Not Inspected

| (E) | | here adequate aisle space unobstructed movement? | * | | | |
|-----|----|---|----------------|----|-----|-------------------|
| | | V. CONTINGENCY PLAN A | | | | EDURES: |
| (A) | | the Contingency Plan contain the owing information: | Yes | No | NI* | Remarks |
| | 1. | The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.) | | | | |
| | 2. | Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37? | <u>×</u> _ | | | |
| | 3. | Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators? | <u>×</u> _ | | | |
| | 4. | A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities? | <u>×</u> | | | |
| | 5. | An evacuation plan for facility personnel where there is a possibili that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?) | ty X | | | Contained in Sine |

Contained in Sine safety plan.

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

| | | | Yes | No | NI* | Remarks |
|-----|-----------|--|-------------|-------|---------|---|
| (B) | ava | copies of the Contingency Plan ilable at site and local emergency anizations? | | X | | <u> </u> |
| (C) | Eme | rgency Coordinator | | | | |
| | 1. | Is the facility Emergency Coordinator identified? | <u>x</u> | | | · · · · · · · · · · · · · · · · · · · |
| | 2. | Is coordinator familiar with all aspects of site operation and emergency procedures? | <u>×</u> | | | |
| | 3. | Does the Emergency Coordinator have the authority to carry out the Contingency Plan? | <u>x</u> | | | |
| (D) | Eme | rgency Procedures | | | | |
| | at Coo | an emergency situation has occurred this facility, has the Emergency ordinator followed the emergency occdures listed in 265.56? | | | | N/A No emergency has occurred at this facility relating to hazardous wast REPORTING activity. |
| | | VI. MANIFEST SYSTEM, RE (Part 265 | Subp | art E | AND | REPORTING |
| | | | Yes | No | NI* | Remarks |
| (A) | Use | of Manifest System | | | | |
| | 1. | Does the facility follow the procedures listed in §265.71 for processing each manifest? | | | | NA Site does not accept waste from |
| | 2. | Are records of past shipments retained for 3 years? | <u>×</u> | | | off. site |
| (B) | rec | es the owner or operator meet quirements regarding manifest screpancies? | | | <u></u> | N/A See (A) 1 above. |

VI. RECORDKEEPING - Continued

| (C) | 0pe | rati | ng Record | | | |
|-----|-----|------------|--|--------------|------|-------------------|
| | 1. | mai rec | s the owner or operator ntain an operating ord as required in .73? | <u>*</u> | | |
| | 2. | con | s the operating record tain the following ormation: | | | |
| | * | *b. | The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I? | × | | |
| | | С. | The location and quantity of each hazardous waste within the facility? | <u> </u> | | |
| | ** | *d• | A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.) | | | N/A |
| | | e. ` | Records and results of all waste analyses, trial tests, monitoring data, and operator inspections? | <u> </u> | | |
| | | f. | Reports detailing all incidents that required implementation of the Contingency Plan? | | | N/A No incidents. |
| | | g. | All closure and post closure costs as applicable? (Effective 5-19-81) | _ X _ | | |

^{**} See page 33252 of the May 19, 1980, Federal Register.

^{***} Only applies to disposal facilities

VII. CLOSURE AND POST CLOSURE (Part 265 Subpart G)

| | | | Yes | No | NI* | Remarks |
|-----|-------|--|-------------|-----------------|----------|--|
| (A) | Clo | sure and Post Closure | | | | |
| | 1. | Is the facility closure | <u>×</u> | | · | |
| | 2. | Has this plan been submitted to the Regional Administrator | | | | NIA Closure not expecta |
| | 3. | Has closure begun? | | | | within 180 days of the date of this inspection |
| | 4. | Is closure estimate available by May 19, 1981? | _×_ | | | |
| (B) | Pos | t closure care and use of property | | | | |
| | a p | the owner or operator supplied ost closure monitoring plan? fective by May 19, 1981) | | - | | N/A Treatment, |
| | | VIII. FACT (Part 265, St USE AND MANAGEN | ıbpart I | s I th | nru R) | |
| Fac | ility | Name: Acme Barrel Company | | Da ¹ | te of I | nspection: <u>Oct.20,1982</u> |
| | | · | Yes | No | NI* | Remarks |
| | 1. | Are containers in good condition? | <u> </u> | | | |
| | 2. | Are containers compatible with waste in them? | K | | | |
| | 3. | Are containers stored closed? | | <u>x</u> | | Not designed to be stored closed. |
| | 4. | Are containers managed to prevent leaks? | <u> </u> | | | Stoke Closes. |
| | 5. | Are containers inspected weekly for leaks and defects? | <u> </u> | | <u>.</u> | More Grequently. |
| | 6. | Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.) | | | · | MIA No ignituble or reactive waste stored at the facility. |

REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

The facility generates hazardous waste as a result of its drum reconditioning operations. The waste generated is hazardous because of EPTox (lead).

The sludge is treated to with lime in a roll-off box prior to disposal at a landfill. Analysis of the treated sludge indicates that the material is no longer hazardous by characteristic.

During the inspection it was noted that the facility had not prepared written job descriptions, descriptions of the type and amount of training, documentation of training (Section 725.116(d)) and had not submitted a copy of the contingency plan to the appropriate local authorety (725.153(b)).

| | • | | | | |
|----|--|-----|-----|-----|---------|
| | | Yes | No | NI* | Remarks |
| 7. | Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.) | | *** | | NA ALM |
| 8. | Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance? | | ~~~ | ••• | Alu |



ENVIRONMENTAL PROTECTION AGENCY STATE OF ILLINOIS INTER-OFFICE CORRESPONDENCE

| | | DAT | E: | | | | | | | | | | | | | | | | | | | | | | | | | |
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